



Order Filed on January 3, 2018
by Clerk, U.S. Bankruptcy
Court - District of New Jersey

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PHELAN HALLINAN DIAMOND & JONES, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
856-813-5500

Attorneys for Secured Creditor: PARAMOUNT
RESIDENTIAL MORTGAGE GROUP, INC.
UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

CHRISTOPHER A. DAWES

Case No: 17-29111 - SLM

Hearing Date: 12/13/2017

Judge: Stacey L. Meisel

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION

The consent order set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**.

DATED: January 3, 2018

A handwritten signature in cursive script, reading "Stacey L. Meisel".
Honorable Stacey L. Meisel
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:

CHRISTOPHER A. DAWES

CASE NO. 17-29111 - SLM

Debtor

CHAPTER 13

CONSENT ORDER RESOLVING
OBJECTION TO CONFIRMATION

HEARING DATE: 12/13/2017

This Consent Order pertains to the property located at 1414-16 FRANCES LANE, PLAINFIELD, NJ 07062-2125, mortgage account ending with "5388";

THIS MATTER having been brought before the Court by Michelle Labayen, Esquire attorney for debtor, CHRISTOPHER A. DAWES upon the filing of a Chapter 13 Plan, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. by and through its attorneys, Phelan Hallinan Diamond & Jones, PC having filed an Objection to the Confirmation of said Chapter 13 Plan and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for other and good cause shown:

1. The secured creditor, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC., shall be permitted to file a secured Proof of Claim after Confirmation. The arrears reflected in said to-be-filed secured Proof of Claim will be approximately **\$127,087.76**.
2. The Trustee is authorized not to pay the secured arrearage claim (Proof of Claim to be filed shortly) of PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.. for the purpose of allowing the Debtor to apply and potentially complete a loan modification. Should the Debtor qualify for a loan modification, the loan modification must be approved no later than **March 18, 2018 or as extended by the Court**.
3. If Loan Modification is approved, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. shall file an Amended Proof of Claim showing the amount of arrears paid to date by the Trustee.
4. If a loan modification is not approved by **March 18, 2018 or as extended by the Court**, the debtor shall do one of the following: 1) file a Modified Plan to cure the arrearage claim of Movant; or 2) file a Modified Plan to surrender the property subject to said claim; or 3) a Notice to Convert to Chapter 7; or 4) a Notice to Dismiss Case.
5. Debtor acknowledges that the monthly post-petition mortgage payment amount is subject to change in accordance with the terms of the note and mortgage.

6. Debtor shall tender adequate protection payments to PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. as required by the Loss Mitigation Program (LMP). The adequate protection payments will continue only while the Debtor is in LMP. The Loss Mitigation Program is scheduled to terminate on March 18, 2018. If the Debtor fails to make adequate protection payments, PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. will file an Application for Early Termination of LMP. Once the Loss Mitigation Program terminates on March 18, 2018, or an earlier date confirmed by the court, the Debtor shall cease tendering the reduced adequate protection payments and begin making regular monthly mortgage payments to PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC. as required by the mortgage and note.

7. This Consent Order shall be incorporated in and become a part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,
Content and entry of the within Order:

PHELAN HALLINAN DIAMOND & JONES, PC
Attorneys for Secured Creditor:
PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.

/s/ Nicholas V. Rogers
Nicholas V. Rogers, Esq.
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
Tel: 856-813-5500 Ext. 42689
Fax: 856-813-5501
Email: nicholas.rogers@phelanhallinan.com

Dated: 01/02/2018

/s/Michelle Labayen
Michelle Labayen, Esquire
Attorney for debtor

Dated: 01/02/2018